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Of Counsel
Gregg J. Gunta

November 4, 2022

Honorable Nancy Joseph
United States District Court
Eastern District of Wisconsin
517 East Wisconsin Avenue
Milwaukee, Wisconsin 53202

RE: *Knowlton, et al. v. Wauwatosa, et al.*
Case No. 20-CV-1660

Dear Judge Joseph:

Please let this letter serve as Defendants update on the status of discovery in this matter. On November 3, 2022, the parties met and conferred regarding outstanding discovery, particularly Defendants pending motions to compel interrogatory and request for production responses (ECF No. 228) and requests for admission (ECF No. 224). Attorney William Sulton appeared for Plaintiffs and Attorney Kiley Zellner appeared for Defendants.

During the meet and confer, Attorney Sulton advised amended responses to the requests for admission addressing Defendants' motion to compel (ECF No. 224) would be provided to Defendants no later than November 5, 2022. Regarding Defendants' motion to compel interrogatory and request for production responses (ECF No. 228), Attorney Sulton advised he could provide amended, individualized, signed responses no later than November 11, 2022. Attorney Sulton further advised he would not object to a deposition request from Defendants necessitated by Plaintiffs' amended responses.

During the meet and confer, Attorney Sulton did not identify any specific request or interrogatory that remained objectionable to Plaintiffs. As such, Defendants are hopeful their motion to compel requests for admission responses (ECF No. 224) will be resolved prior to the status conference on November 7, 2022. To the extent Plaintiffs intend to oppose portions of Defendants' motions to compel, Defendants believe the response deadline of November 7, 2022, should remain so those issues can be addressed. To the extent, Plaintiffs decide to fully address the issues outlined in the motion to compel interrogatory and request for production responses

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(ECF No. 228) Defendants will not oppose those amended responses being provided by November 11, 2022.

Respectfully submitted,

WIRTH + BAYNARD
Attorneys for Defendants

/s/ Kiley B. Zellner
Kiley B. Zellner